

AO 91 (Rev. 11/11) Criminal Complaint

FILED**UNITED STATES DISTRICT COURT**

for the

Western District of Texas

September 09, 2024
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: Myrna Gallegos
DEPUTYUnited States of America
v.
Terrazas Romero, EleazarCase No. **EP-24-MJ-3859** -ATBDefendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

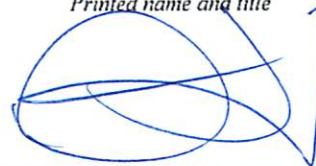
On or about the date(s) of September 6, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section*18 USC 1542 - False statement in
an application for passport*Offense Description*Whoever willfully and knowingly makes any false statement in an application
for passport with intent to induce or secure the issuance of a passport under
the authority of the United States, either for his own use or the use of
another, contrary to the laws regulating the issuance of passports or the rules
prescribed pursuant to such laws

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 09/09/2024City and state: El Paso, TexasLindsey Muschkat
*Complainant's signature*Lindsey Muschkat, Special Agent*Printed name and title**Judge's signature*Anne T. Berton, U.S. Magistrate Judge*Printed name and title*Complaint sworn to telephonically on
September 09, 2024 at 1:07 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

I, Lindsey Muschkat, being duly sworn, hereby depose and state:

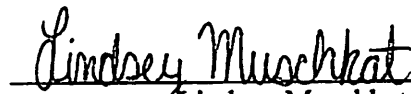
I have been a Special Agent with the United States Department of State, Diplomatic Security Service (DSS), since 2008, and I am currently assigned to the El Paso Resident Office. I have participated in numerous investigations and arrests, including those involving identity theft and passport fraud. I have completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center and the Basic Special Agent Course at the Diplomatic Security Training Center.

Facts included in this affidavit were gathered either by me, the U.S. Department of State, or by cooperating local, county, state, or federal agencies. These facts may not represent all the facts gathered to date, but only those necessary to establish probable cause in this matter.

This investigation has resulted in probable cause that on or around September 6, 2024, the Defendant, Eleazar Terrazas Romero, submitted a passport application in the identity of C.J.M.S. at the El Paso Passport Agency in El Paso, Texas, in the Western District of Texas. The Defendant claimed to be C.J.M.S. even though he knew this to be false.

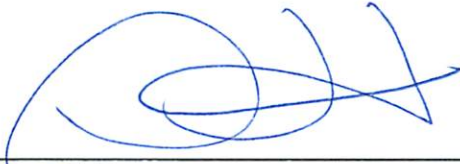
The Seattle Passport Agency processed the Defendant's renewal application in the C.J.M.S. identity that was submitted by mail on or around February 2024 and noted that the Social Security number claimed by the Defendant was issued in 2004 at the age of 32. A death certificate from Arizona was located in the C.J.M.S. identity with a date of death of approximately five days after birth in 1972. The Seattle Passport Agency found that the Defendant might be Eleazar Terrazas Romero, born in 1965 in Chihuahua, Mexico. The case was referred to the DSS El Paso Resident Office for investigation. The El Paso Resident Office noted that the Defendant listed his daughter, who has the last name Terrazas, as his emergency contact on his February 2024 passport application. This daughter's Mexico birth record lists her father as Eleazar Terrazas Romero of Mexico.

On or around September 6, 2024, the Defendant submitted another passport application at the El Paso Passport Agency. On September 6, 2024, the Defendant waived his rights and agreed to be interviewed by law enforcement. After initially claiming to be C.J.M.S., the Defendant admitted that his true identity is Eleazar Terrazas Romero and that he was born in 1965 in Mexico. The Defendant said he obtained the birth certificate in the C.J.M.S. identity from the father of C.J.M.S.



Lindsey Muschkat, Special Agent
U.S. Department of State, Diplomatic Security Service

Electronically signed and telephonically sworn on
This 9th day of September, 2024.



Anne T. Berton
United States Magistrate Judge